



*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 17, 2022

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Cheema et al*, 22 Cr. 615 (LGS)

Dear Judge Schofield:

The Government respectfully writes on behalf of the parties to advise the Court of the arraignment of the defendants and in response to the Court's Order dated November 10, 2022 ([Dkt. No. 37](#)). The defendants were arraigned before Magistrate Judge Jennifer Willis on Monday, November 14, 2022. At the conclusion of the proceeding, Magistrate Judge Willis ordered the exclusion of time under the Speedy Trial Act between November 14, 2022, and December 1, 2022.

This five-defendant case involves allegations of a multi-year scheme to defraud New York City via contracts to perform general contracting work at homeless shelters; a similarly long-running conspiracy to launder the proceeds of that scheme; and a scheme to defraud the Medicaid program. The discovery is voluminous, including many thousands of pages of records from, among other sources, public agencies, concerning the contracts and Medicaid applications at issue, and financial institutions, concerning numerous bank accounts. In addition, on September 21, 2022, the Government executed a search warrant at an office from which certain of the defendants worked, seizing approximately ten boxes of records, six computers, and seven external drives.

The Government anticipates producing discovery on a rolling basis, with a substantial initial production within the next approximately two weeks. In light of the magnitude of the discovery, the parties propose the following schedule:

- Discovery produced by February 3, 2023;
- Defense motions, if any, filed by April 7, 2023; and
- Government response to any such motions filed by May 5, 2023.

The parties propose that the Court hold a status conference on May 22, May 23, or May 24, 2023.

The parties further request that the Court exclude time under the Speedy Trial Act between November 17, 2022 and the conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendants in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted to allow time for the defendants to review discovery, for the defendants to consider and prepare any appropriate motions, and for the parties to engage in discussions of potential pretrial resolutions of this case.

Respectfully submitted,


DAMIAN WILLIAMS  
United States Attorney

By: \_\_\_\_\_/s/  
Timothy V. Capozzi  
Assistant United States Attorney  
(212) 637-2404

cc: Defense Counsel (by ECF)

Application Granted. Rule 16 discovery shall be completed by **February 3, 2023**. Defendant's motion(s), if any, shall be filed by **April 7, 2023**. The Government's response, if any, shall be filed by **May 5, 2023**. Defendant's reply, if any, shall be filed by **May 19, 2023**. The parties shall appear for a status conference on **June 5, 2023, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between today and June 5, 2023, outweigh the best interests of the public and the Defendants in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because it will allow time for the Defendants to review discovery, contemplate the filing of any motions, and engage in discussions of potential resolutions of this case. It is hereby ORDERED that the time between today and June 5, 2023, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 47.

Dated: November 18, 2022  
New York, New York

  
\_\_\_\_\_  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**